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January 31, 2023

VIA EMAILGeoffrey M. Drake
King & Spalding, LLP
1180 Peachtree Street NE, Suite 1600
Atlanta, GA 30309
gdrake@kslaw.com**IN RE: Reid, et al. v. Doe Run Resources Corporation, et al.,
 Case No. 4:11-cv-00044-CDP (consolidated cases)**

Dear Geoffrey:

Enclosed are notarized profile sheets for 26 of the 76 Plaintiffs identified in the first category of your January 3rd letter (*see* Exhibit 1). These were previously obtained but were inadvertently not produced. In 2020 and 2021, there were government-ordered lockdowns in Peru, as well as plaintiffs who temporarily moved out of town and members of our staff who contracted Covid-19. Despite those circumstances, we worked to comply with your requests and obtain the profile sheets you indicated were missing. We are continuing to obtain notarized profile sheets for the other 50 Plaintiffs identified in the first category of your letter. It is our goal to have those produced to you by March 31; however, the current political situation in Peru presents additional complications – just last week there were roads and major highways closed, making travel more difficult – which could result in some additional, unavoidable delay.

As to the remaining 130 Plaintiffs identified in your letter, we are in the process of obtaining updated and/or supplemental profile sheets and aim to produce them to you according to the schedule set forth below. In the event we are unable to meet these deadlines for any reason, we will provide you with an update on the status of our efforts and the reason behind the delay. In the meantime, we fail to see how your clients have been prejudiced and do not agree to dismiss the lawsuits filed by any of these Plaintiffs.

Profile Sheets without notarization	Target Production Date to Defendants
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

[illegible]

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We are available to discuss this further by phone if you would like.

Very truly yours,

Kristine K. Klags

Kristine Kraft, Partner

KK/lsw

cc: Thomas P. Berra
Michael J. Hickey
Edward L. Dowd
Tracie J. Renfroe
Andrew T. Bayman
Carmen Toledo
Nathan Stump
Denisse Icenogle

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